



## SUPERFUND RECORDS

Date March 9, 1982

Subject Comments on the Pine Ford Project, Missouri

From Director, Air and Waste Management Division

To Thomas L. Budd, Acting Assistant Regional Administrator  
for Policy and Management**DRAFT**BIG RIVER MINE  
MOD 98126899

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Regarding the above referenced project, my staff has prepared comments on questions 3a, 3b, and 3c as requested. Additional information may be obtained from Katie Biggs or Richard Smith, Superfund Section.

3a Recently WMBR has been asked to review and comment on several stream channel modification projects by the Corps of Engineers which may involve the dredging and disposal of sediments that may be hazardous under RCRA. The costs associated with disposal of these potentially hazardous stream sediments at a RCRA disposal facility are believed to be very high but no actual dollar amounts have been determined.

WMBR estimated the costs to transport and dispose of hazardous stream sediments for one project involving 38 miles of drainage ditches by excavating approximately 1.3 million cubic yards of sediments believed to be contaminated with heavy metals and pesticides. The estimated cost for transportation and disposal was \$92 million, an obviously prohibitive cost compared to the total project cost of \$3.7 million.

WMBR has placed ~~the~~ <sup>of-contaminated sediments</sup> issue before the Office of Solid Waste. EPA Region X has raised the same issue. We have comments from Headquarters that perhaps a neutral water leachate test may be applied to the sediments rather than the acid leach now required by the EP toxicity test procedures. However, we have not yet received written guidance.

3b In order for funds to be expended under Superfund, the site must be on the National Priority List (NPL). The listing of a site on the NPL does not preclude the use of funds from state, local, and private sources to clean up the site. These sources of funds are preferred, especially the use of private funds where a responsible party can be identified. If a responsible party cannot be identified, or if the responsible party is unable or unwilling to undertake remedial action, then Superfund monies can be used for remedial actions. This requires a state match of 50% for action at a public site and 10% for a private site or facility.

Any proposal for Superfund should be coordinated with the State to assure the funding match will be available should responsible parties not be identified and Superfund monies are sought.

3c WMBR has some data on tailings in the Big River area and we are aware that there may be river sediment studies done under the 208 program. We do not, however, have copies of this information. It would be best to have the project sponsor contact Dick Smith (374-6531) so that we can determine the types of information needed or sought as compared to that already available to the sponsor.

Please note, the Superfund notification excluded mining wastes. The Superfund notification was limited in scope for program management reasons. However, this limitation does not extend to the Superfund legislation itself. The definition of hazardous substances under Superfund is extensive (CERCLA, Sec 101(14)). It is possible that mining wastes which were excluded from the notification program could contain hazardous substances as defined by CERCLA and become a candidate for cleanup action.

*APCOE has  
a contract  
to control  
sediments.  
Assume they  
remove them  
and dispose  
as RCRA in W*

*A. Jone needs  
to be sure  
not on line 14900  
list*

*PERC-  
EPA  
Study  
What is this?  
Fennema  
checking on this*